

Brambles' Speak Up Privacy Notice

Brambles Limited and its affiliates, including its companies operating under the CHEP brands (collectively, "Brambles" or "we" or "our" or "us"), respect your right to privacy and your right to control the dissemination of your personal information. Please click [here](#) for a list of our business locations.

This notice applies to the Brambles Speak Up platform and program (collectively, "Speak Up"). It also describes i) why we need your personal information and how we use it either as reporter, witness or as the alleged wrongdoer, ii) what types of personal information is collected and processed, iii) who may have access to your information and iv) your rights regarding privacy.

Speak Up is a confidential reporting system hosted and managed by NAVEX, Brambles' third-party provider, that allows you to raise concerns about actual or suspected violation of Brambles' Code of Conduct, Brambles' Code of Conduct Policies or applicable laws and regulations, unless otherwise prohibited by applicable law. For further information about this program, please visit [Brambles' Speak Up Policy](#) and [Brambles' Speak Up Investigative Procedures](#). Further information about NAVEX is provided in this notice.

The use of Speak Up is entirely voluntary. Individuals are encouraged to report possible violations directly to their supervisor or manager, or to a representative of the Human Resources, Legal or the Ethic and Compliance teams, depending on the nature of the possible violation. If you feel that you are unable to do so, you may use Speak Up to make your report. By using Speak Up, you acknowledge you have read and understood the terms of this notice.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from Brambles for any report of a suspected violation as long as you have reasonable grounds for making it, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions we may have.

This notice addresses the following topics:

1. [What personal information is collected and processed](#)
2. [How is personal information collected](#)
3. [How is personal information processed](#)
4. [Who will have access to personal information](#)
5. [Legal basis to collect and process personal information](#)
6. [Special Provisions for European and UK individuals](#)
7. [Privacy Rights](#)
8. [Data Retention](#)
9. [Security](#)
10. [How to Contact Us](#)
11. [Privacy Notice Updates](#)
12. [Supplemental Privacy Notice for California Users](#)

Please note that this notice uses the terms “personal data” and “personal information” interchangeably and they are defined as mean any information relating to an identified or identifiable natural person. An identified or identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification or social security number, a driver’s license number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, or as may be further specified by an applicable data protection or privacy law.

1. WHAT PERSONAL INFORMATION IS COLLECTED AND PROCESSED

Through Speak Up we may collect and process the following personal information:

- reporter’s first name, last name, contact details (unless they report was made anonymously), and relationship with Brambles;
- witnesses and alleged wrongdoers’ first name, last name, job title, and any other personal information the reporter or any other involved individual may provide during the investigation (i.e., description of functions, contact details); and
- description of the alleged misconduct or wrongdoing as well as a description of the circumstances of the incident(s). This may involve collecting and processing sensitive personal information related to any of the involved individuals such as data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, or sexual orientation.

2. HOW IS PERSONAL INFORMATION COLLECTED

As part of Speak Up, we may collect personal information through the following sources:

From Speak Up online form or from Speak Up Hotline

Speak Up reports can be made either using [Brambles’ Global Speak Up Online Form](#) or calling [Brambles’ hotline](#). When reporting a case, we may ask the reporter to provide some basic information about the complaint. That will allow us to log the case and proceed with the corresponding investigation.

In those countries where anonymous reporting is allowed, the reporters do not have to give their name when they speak up by either completing the online form or dialing the hotline. If reporters choose to make report anonymously, they will be given a report key and asked to create a password. They will need to retain both to return to the report previously submitted. When they check back, they can monitor the progress of their concern and add additional information, as necessary. This will also allow Brambles to ask any follow-up questions, while protecting reporters’ anonymity.

From Further Communications

To properly handle a Speak Up report and proceed with the investigation, we will contact the reporter to collect further information and/or clarify any questions or doubts we may have regarding the initial complaint.

From the Investigation

During the investigation we may receive or collect personal information related to the reporter, the witnesses, and the alleged wrongdoer either from the interviews we may held with the affected or involved individuals, as well as from any necessary supporting evidence we may collect.

3. HOW IS THE PERSONAL INFORMATION PROCESSED

Personal information will be processed in order to:

- Log the report in the Speak Up system provided by Navex.
- Carry out the investigation. This may include setting up interviews with individuals affected or involved in the case being reported, collecting evidence, and producing interview minutes and the final report.
- Take action against the wrongdoer if the complaint is substantiated.

4. WHO WILL HAVE ACCESS TO PERSONAL INFORMATION AND WHERE (CROSS BORDER DATA TRANSFERS)

The report and reporters, witnesses and wrongdoers' personal information are held on the secure servers of NAVEX located in the European Union and may be transferred to NAVEX sub-processors outside the EU/EEA for service and support or translation and interpretation purposes. Brambles has executed contractual commitments with NAVEX to secure the personal information in accordance with applicable laws and cross border data transfer requirements.

For the purpose of processing and investigating the reports and subject to the provisions of local law, personal information may be accessed, processed and used by the relevant personnel of Brambles which may include Human Resources, Finance, Internal Audit, Legal, and the Ethics and Compliance teams, Company Management, external advisors (e.g., legal advisors), or, in limited circumstances, by technical staff at NAVEX. Those individuals may be located in the United States, the United Kingdom or elsewhere. Contractual protections, including cross border data transfer legal mechanisms are executed when required.

When personal information is shared within Brambles, the relevant personnel will have access on need-to-know basis and have committed themselves to confidentiality. Sharing your information within the Brambles Group is subject to an Intragroup Data Transfer Agreement. Additionally, as some Brambles Group entities are located outside the European Union (EU), the European Economic Area (EEA) and the United Kingdom (UK), International Data Transfers will take place consistent with the safeguards set out in Standard Contractual Clauses and/or Standard Data Protection Clauses adopted or approved by the European Commission or an equivalent supervisory authority.

We may also disclose personal information to the police and/or other enforcement or regulatory authorities, as necessary or required.

We may share non-personal information, such as aggregate statistics, with third parties or internally at Brambles for data analysis in order to detect trends, as well as improve our Speak Up program.

5. LEGAL BASIS TO COLLECT AND PROCESS PERSONAL INFORMATION

We will only collect and process personal information about the reporter, witnesses, and alleged wrongdoer where we have a legal basis to do so, including: i) compliance with a legal obligation; ii) your consent (e.g., regarding the collection or processing of sensitive information); and iii) the fulfilment of a legitimate interest.

We may process personal information for the purposes of our legitimate interests, provided that such processing does not outweigh affected individuals' rights and freedoms. Where we rely on legitimate

interests, individuals have the right to object. Please keep in mind that if you object to our processing, this may affect our ability to perform certain services for your benefit.

6. SPECIAL PROVISIONS FOR OUR EUROPEAN AND UK INDIVIDUALS

6.1. Where we store your personal information

The personal data and information related to European and UK individuals will be stored in a database which is located on servers hosted and operated in the European Union by NAVEX.

6.2. European and UK Supervisory Authorities

European and UK individuals have the right to register a complaint with a European data protection or supervisory authority about our collection and use of their personal information. For more information, please contact your local data protection authority (contact details for EU data protection authorities are available at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm; Switzerland and Norway data protection authorities information is available at [Homepage \(admin.ch\)](#) and at [Frontpage | Datatilsynet](#), respectively, and for UK data protection authority at <https://ico.org.uk/>).

7. YOUR PRIVACY RIGHTS

Depending on the applicable data protection regulations, reporters, witnesses and alleged wrongdoers may: (i) request information on and access to the personal information We hold about them (Right of Access); (ii) request that any inaccurate personal information We hold be corrected (Right to Rectification); (iii) to object to certain types of processing of their personal information We carry out (including the right to opt-out of any direct marketing) (Right to Object); (iv) request that We delete the personal information We hold about them (Right to Erasure or Right to be Forgotten); (v) request that we restrict our processing of their personal information in certain circumstances, such as when they contest the accuracy of that personal information (Right to Restriction of Processing); (vi) request a copy of their personal information in a machine readable, commonly used format (or to request We transfer their personal information in such a format to a third party service provider) (Right to Data Portability); (vii) request not to be subject to an automated decision-making or profiling; and/or (viii) withdraw their consent at any time when we process your personal information based on their consent.

Individuals may exercise any of the applicable rights through Brambles' Know Your Privacy Rights Platform [here](#).

We will only restrict any of the above rights if and to the extent that that is necessary and proportionate in order to safeguard any of the major public interests recognized in applicable law such as the protection of criminal investigations or public security, or to protect the fundamental rights and freedoms of others, including any person(s) incriminated in your report, in accordance with applicable law.

8. DATA RETENTION

Individuals' personal data will be securely stored in NAVEX system and server and will be retained as long as it is necessary to complete the investigation and comply with our legal retention obligations, consistent

with Brambles' Global Record Retention Policy and Schedule. Once your personal information is no longer needed, it will be securely destroyed or erased.

9. DATA SECURITY

NAVEX is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

Additionally, Brambles has policies and controls in place to protect your personal information from loss, accidental destruction, misuse, or disclosure. Some of these security controls may include:

- implementing appropriate technical and organizational measures to protect the confidentiality, integrity and availability of personal data and information,
- on-going training and awareness for staff on information assurance and security, and
- alignment with Brambles' Code of Conduct and Privacy and IT Security Policies

10. HOW TO CONTACT US

If you have any questions, comments or concerns about this Privacy Notice or if you would like us to update information we have about you or your preferences, please contact Brambles' Data Privacy Team at privacy@brambles.com.

11. PRIVACY NOTICE UPDATES

We reserve the right to modify or supplement this Privacy Notice at any time. Changes to the policy will be posted at least 30 days prior to the effective date of the changes. The date below indicates when this Privacy Notice was last changed.

This policy was last updated on August 30th, 2024, effective September 30th, 2024.

Supplemental Privacy Notice for California Users

Effective Date: September 30th, 2024

This Supplemental Privacy Notice for California Users ("California Notice") is provided to inform how we may process personal information of California consumers. This California Notice supplements our other privacy policies and notices, including our main Privacy Notice. In the event of a conflict between any other policy, statement, or notice and this California Notice, this California Notice will prevail as to California consumers and their rights.

1. INFORMATION WE MAY COLLECT FROM CALIFORNIA RESIDENTS

The specific pieces of personal information that Brambles collects, uses, and shares are the ones identified in Section 1 "What Personal Information Is Collected And Processed" of Brambles' Speak Up Privacy Notice.

2. SOURCES OF PERSONAL INFORMATION AND HOW WE USE IT

We collect information from a variety of sources as specified in Section 2 "How Is Personal Information Collected" and Section 3 "How Is The Personal Information Processed" of Brambles' Speak Up Privacy Notice.

3. DISCLOSURES AND SALES OF INFORMATION

We share personal information as specified in Section 4 “Who Will Have Access To Personal Information And Where (Cross Border Data Transfers)” of Brambles’ Speak up Privacy Notice. We do not sell personal information collected and processed in the framework of Speak Up investigations.

4. CALIFORNIA PRIVACY RIGHTS

4.1 Your Rights

California Users have the right: (i) to know the categories and/or specific pieces of personal information collected about them, including whether their personal information is sold or disclosed and the purpose, and with whom their personal information was shared in the prior twelve months; (ii) to request deletion of personal information, if permissible by law; (iii) to access a copy of the personal information we retain about them; (iv) to opt-out of the sale of personal information; and (v) to non-discrimination based on the exercise of a consumer’s privacy rights.

4.2 Exercising Your Rights

California Users may exercise any of the rights described in this California Notice through Brambles’ Know Your Privacy Rights Platform [here](#) or calling the following toll-free number: 1-855-409-0019. We will promptly respond to all applicable requests.

We will verify requestors’ identity in connection with any requests they submit to help ensure that we provide the information we maintain to the individuals to whom it pertains and allow only those individuals or their authorized representatives to exercise rights with respect to that information. If you are an authorized agent making a request on behalf of a consumer, we may require and request additional information to verify that you are authorized to make that request.

We reserve the right to deny your request if we cannot verify your identity. Where we deny your request in whole or in part, we will inform you of the denial, provide an explanation of our actions, and the reason(s) for the denial.

We will not restrict or deny you access to our services because of choices and requests you make in connection with your personal information.

5. CALIFORNIA’S “SHINE THE LIGHT” LAW

California residents are entitled, once a year, free of charge, to request information regarding our disclosure, if any, of certain categories of personal information to third parties for their direct marketing purposes in the preceding calendar year. They may exercise your right under California’s “Shine the Light” Law by contacting us as detailed in the “How to Contact Us” section of the California Notice.

6. CALIFORNIA RESIDENTS AND DO-NOT-TRACK DISCLOSURE

Because there is not yet a consensus on how companies should respond to web browser-based or other do-not-track ("DNT") mechanisms, our Speak Up online form does not respond to web browser-based DNT signals.

7. HOW TO CONTACT US

If you have any questions, comments or concerns about this Privacy Notice or about privacy generally, please contact our Privacy Team at privacy@brambles.com.

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